of the Northwestern Law Review (vol. iii. p. 1). Mr. Hadley is not inclined to admit the existence of a right to privacy. "When an individual walks along the streets in the sight of all," according to Mr. Hadley, "he has waived his right to the privacy of his personality;" and if a newspaper reporter sketches him and publishes the sketch accompanied by a "description of the peculiarities of his appearance, walk, habits, and manners," — why, Mr. Hadley is sorry for the individual if it is distasteful. Mr. Hadley also makes the point that the right to privacy stretches equity jurisdiction beyond its proper limits. But it is not clearly set forth how it does so to a greater degree than any case of first impression does. And, finally, *Monson* v. *Tussaud* (10 *The Times* Law Reports, 199, 227, noticed 7 HARVARD LAW REVIEW, 492), the most important recent English case on the subject, is not mentioned, though decided and commented upon more than six months before the publication of this article.

Corliss v. *Walker*, 57 Fed. Rep. 434, came up a second time on Nov. 19, 1894, on a motion to dissolve the injunction restraining the use by the defendants of a picture of the late Mr. Corliss. Colt, J., decided that the injunction must be dissolved, Mr. Corliss being a public character, and his personal appearance therefore in a sense public property. On the rights of a private person the language is explicit. Colt, J., says that, "Independently of the question of contract, I believe the law to be that a private individual has a right to be protected in the representation of his portrait in any form, that this is a property as well as a personal right, and that it belongs to the same class of rights which forbids the reproduction of a private manuscript or painting, or the publication of private letters, or oral lectures delivered by a teacher to his class, or the revelation of the contents of a merchant's books by a clerk."

The other branch of the case still stands for the proposition that one may write and publish about either public or private persons; but, Mr. Corliss being held to be a public man, the remarks about private persons may be fairly said to be *obiter*, and the point open for the consideration which some gross case of invasion of privacy may soon require for it.

Mr. Hadley's article is well worth reading as the first attempt to make a careful presentation of the reasons against the right to privacy. And the new cases are interesting as showing that the law on the subject is in no danger of becoming obsolete, but rather serves a real and useful purpose to an increasing number of complainants.

WHAT IS THE REASON FOR OUR LAW OF CONFESSION? — The case of *State* v. *Harrison*, 20 S. E. Rep. 175 (N. C.), raises an interesting question as to the admissibility of confessions obtained by promise of favor. The defendant, an ignorant and superstitious woman, was convicted of the murder of her husband. The court admitted in evidence a confession obtained from her under the following circumstances. A detective disguised himself and, pretending to possess magical powers, so worked on her superstition that she believed him. He told her, "If you will tell me all about it, I can give you something so you can't be caught." Whereupon she confessed that she was the one who had committed the murder. The court above held this evidence admissible, on the ground that the promise was not one that would be likely to induce the defendant to tell an untruth. If she were really guilty, it would be a strong inducement to her to tell the truth; but if she were not, there would be no incentive to tell a lie and say she was guilty.

One may fairly argue that the inducement held out might very well have led the woman to lie, in order to obtain the charm or talisman. She might think it of great value to her, even though she was innocent. But granting the court's position, that the favor promised was one that would induce none but a guilty person to confess, have we here the true test of admissibility? Are confessions obtained by promises of favor to be excluded for the sole reason that they lack credibility? There are numerous *dicta* to that effect. So Keating, J., in *Reg.* v. *Reason*, 12 Cox, 228; Littledale, J., in *Rex* v. *Court*, 7 C. & P. 486; and Coleridge J., in *Rex* v. *Thomas*, 7 C. & P. 345. But in none of these cases, or others hitherto decided, has it been necessary to go so far as to hold that the sole ground of exclusion. May it not be that the true ground is an aversion on the part of English-speaking peoples to the use in criminal cases of evidence obtained by such questionable means? May it not be from a spirit of fair play to the defendant? That would seem to be the reason why confessions obtained by threats are excluded. At all events, such a feeling has always had great influence on the minds of English and American judges. Whether it is wise to be so careful of the prisoner is another and larger question. Protests against such an excessive solicitude are not wanting to-day, and among them one may, perhaps, count this North Carolina case.

ADMISSION TO THE NEW YORK BAR. — In the latest rules of the New York Court of Appeals in relation to the admission of attorneys and counsellors-at-law, an important relaxation is noticeable in the rather draconic severity on this subject that has characterized that State. In the past, one year's study in a local office has been an indispensable and rather appalling requisite; but, according to the rules promulgated on October 22, that is now done away with, and different qualifications substituted in its stead. To entitle an applicant to an examination, he must now have studied law for three years, "except that if the applicant is a graduate of any college or university, his period of study may be two years instead of three." This requirement may be fulfilled "by serving a regular clerkship in the office of a practising attorney of the Supreme Court in this State after the age of eighteen years; *or* after such age, by attending an incorporated law school, etc., etc.; *or* by pursuing such course of study, in part by attendance at such law school, and in part by serving such clerkship." If the applicant be a graduate of a college or university, he must, however, have pursued the prescribed course of study *after* his graduation.

The effect of this change on our Law School will, undoubtedly, be a beneficial one. Men who have not been graduated from college can now prepare for New York Bar examinations, as quickly here as anywhere, while, since the two years' study required from college graduates must be *after* graduation, Harvard seniors will find a leave of absence from the college and three years' study here, their very best method of preparation. To all college graduates, also, now that the shadow of the local office rule has been removed, the Harvard Law School can offer as great facilities for expeditious preparation as any law school in the land.

CHANDELOR *v.* LOPUS. The case of *Chandelor* v. *Lopus*, a famous landmark of the law of deceit and implied warranty, is reported as of Trinity